

THE HONORABLE JOHN H. CHUN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ROXANN BROWN and MICHELLE  
SMITH, on their own behalf and on behalf of  
others similarly situated,

Plaintiffs,

v.

OLD NAVY, LLC; OLD NAVY  
(APPAREL), LLC; OLD NAVY  
HOLDINGS, LLC; GPS SERVICES, INC.;  
and THE GAP, INC., inclusive,

Defendants.

Case No. 2:23-cv-00781-JHC

**DEFENDANTS' NOTICE OF ERRATA**

Noted For Consideration: June 27, 2025

TO: THE CLERK OF COURT

AND TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that the Defendants OLD NAVY, LLC; OLD NAVY  
(APPAREL), LLC; OLD NAVY HOLDINGS, LLC; GPS SERVICES, INC.; and THE GAP, INC.  
("Defendants") respectfully submits this Notice of Errata as follows:

On June 27, 2025, Defendants filed a Reply in support of their Motion to Dismiss (the  
"Reply"). Dkt. No. 42. In the last paragraph of page 9 of the Reply, Defendants quoted *Kleffman*

DEFENDANT'S NOTICE OF ERRATA – PAGE 1  
(Case No.: 2:23-cv-00781-JHC)

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1 v. *Vonage Holdings Corp.*, 2007 WL 1518650, \*3 (C.D. Cal. 2007), followed by a parenthetical  
2 that reads, “(emphasis in original),” in reference to the italicized portion of such quotation. As  
3 emphasis was added by Defendants to the quoted material, no parenthetical was needed in light of  
4 Defendants’ notation in footnote 1 of their Reply that “[a]ll emphases are added by Defendants  
5 unless otherwise noted.” Reply, Dkt. No. 42, at 2 n.1. Accordingly, attached hereto as **Exhibit A**  
6 is a corrected version of the Reply removing the parenthetical notation, “emphasis in original,”  
7 following the above quotation.

8 DATED THIS 1st day of July, 2025.

9 **MORGAN, LEWIS & BOCKIUS LLP**

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